

**Disclosure as to Witness Eric Chu**

**I. Statement of Opinions, Bases and Reasons**

The following is “a complete statement of all opinions that the government will elicit from the witness in its case-in-chief . . . and the bases and reasons for them,” Fed. R. Crim. P. 16(a)(1)(G)(iii):

- In or around late 2015 and early 2016, Eric Chu was a graduate student in computer science at the Massachusetts Institute of Technology. Through his association with Professor Deb Roy, Chu worked on the Electome Project, a project run by the Laboratory for Social Machines, which was a research lab within the MIT Media Lab.
- Chu contributed to an aspect of the Electome Project, which was summarized by another participant of the Electome Project, William Powers, in an article titled, “Who’s Influencing the Election 2016?” (hereinafter, “the Article,” available at <https://medium.com/@socialmachines/who-s-influencing-election-2016-8bed68ddecc3>). This aspect of the Electome Project attempted, in sum and substance, to measure the top 150 influencers in the 2016 election, as measured by those influencers’ presence in election news coverage and Twitter conversation. Chu’s role was to write code that analyzed relevant data in order to produce a list of 150 top influencers.
- In sum and substance, Chu was given access to data sets that had been narrowed by the Electome Project to contain materials largely related to the 2016 election. Chu wrote code to analyze the narrowed data set on four metrics, as described in the Article: (1) total mentions in election news, (2) election news centrality, (3) total Twitter mentions in election tweets, (4) total number of retweets on election tweets. The code authored by Chu, with the assistance of others, weighted those four metrics equally. The influencer list published in the Article reflects the list of influencers who received the highest 150 aggregate scores in the code Chu developed.
- Chu noted that the supervisors of the project made the determination to weigh the four metrics equally. Chu states that the influencer list would have changed if the supervisors of the project had decided to emphasize certain metrics over others.
- The Article contains a “FAQ” which contains information about the influencer list which states that it was prepared by Chu and two of his colleagues, Soroush Vosoughi and Prashanth Vijayaraghavan. Chu does not recall whether he wrote portions of this FAQ or merely contributed to the information listed under his name.

II. Qualifications

The resume attached hereto as Exhibit 1 sets forth “the witness’s qualifications,” per Federal Rule of Criminal Procedure (a)(1)(G)(iii). The resume contains a list of first-author publications authored by the witness in the previous 10 years. The witness has never testified as an expert at trial or deposition.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Eric Chu", is positioned above a horizontal line.

---

Eric Chu